

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 1998 Grand Jury

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
BRUCE EDWARD BELL and)
MONTEZ DAY,)
)
Defendants.)

CR 99- 123

I N D I C T M E N T

[18 U.S.C. § 371: Conspiracy
to Commit Bank Robbery; 18
U.S.C. § 2113(a)(d): Armed
Bank Robbery; 18 U.S.C. §
924(c): Use of Firearm During
Crime of Violence]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 371]

A. OBJECT OF THE CONSPIRACY

Beginning on or before January 22, 1999, and continuing to
on or about January 26, 1999, in Los Angeles County, within the
Central District of California, defendants BRUCE EDWARD BELL and
MONTEZ DAY, and others known and unknown to the Grand Jury,
conspired and agreed with each other to knowingly and
intentionally commit a bank robbery of Home Savings of America,
301 South Maclay Street, San Fernando, California, in violation
of Title 18, United States Code, Section 2113(a).

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U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIF.
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1 B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE
2 ACCOMPLISHED

3 The object of the conspiracy was to be accomplished in
4 substance as follows:

5 1. Defendants BELL and DAY would obtain a stolen van to
6 use as a preliminary getaway vehicle from the robbery.

7 2. Defendants BELL and DAY would park a legally owned Ford
8 Expedition at a distance from Home Savings of America for use as
9 a secondary getaway vehicle from the robbery.

10 3. Defendants BELL and DAY would drive to Home Savings of
11 America in the stolen getaway van.

12 4. Defendants BELL and DAY would enter Home Savings of
13 America brandishing handguns and would order the employees and
14 customers inside to get down on the floor.

15 5. Defendants BELL and DAY would order the manager of Home
16 Savings of America to open the bank vault.

17 6. Defendants BELL and DAY would flee from Home Savings of
18 America in the stolen van.

19 7. Defendants BELL and DAY would switch from the stolen
20 van to the Ford Expedition out of sight of Home Savings of
21 America.

22 8. Defendants BELL and DAY would drive the Ford Expedition
23 to a safe place, where they would divide the money stolen from
24 Home Savings of America.

25 C. OVERT ACTS

26 In furtherance of the conspiracy and to accomplish the
27 object of the conspiracy, on or about January 26, 1999,
28 defendants BELL and DAY, and others known and unknown to the

1 Grand Jury, committed various overt acts within the Central
2 District of California, including but not limited to the
3 following:

4 1. Defendants BELL and DAY drove a stolen getaway van to
5 Home Savings of America.

6 2. Defendants BELL and DAY entered Home Savings of America
7 wearing masks and gloves, and brandishing a revolver and a
8 semiautomatic handgun.

9 3. Defendants BELL and DAY forced the employees of Home
10 Savings of America to open the vault and give defendants \$85,600
11 in cash.

12 4. One of the defendants told Home Savings of America
13 assistant manager Elizabeth Aguillon that she would be sorry if
14 she put a dye pack in with the stolen money because he and the
15 other defendant were going to take her with them when they left.

16 5. One of the defendants stopped assistant manager
17 Elizabeth Aguillon from exiting Home Savings of America by
18 grabbing her by her hair and pulling her back.

19 6. Defendants BELL and DAY fled Home Savings of America in
20 the stolen getaway van.

21 7. Defendants BELL and DAY switched getaway vehicles from
22 the stolen van to a Ford Expedition.

23 8. Defendant DAY drove the Ford Expedition at high speeds
24 to evade the police, striking other vehicles while doing so.

25 9. Defendant BELL threw the revolver out the window of the
26 Ford Expedition during the flight from the police.

27 10. Defendant DAY stopped the Ford Expedition at a mall so
28 that defendants could hide themselves from the view of a police

1 helicopter and pursuing police officers by mixing in with the
2 customers inside the mall.

COUNT TWO

[18 U.S.C. § 2113(a)(d)]

On or about January 26, 1999, in Los Angeles County, within the Central District of California, defendants BRUCE EDWARD BELL and MONTEZ DAY, by force, violence, and intimidation, knowingly took from the person or presence of another approximately \$85,600 belonging to and in the care, custody, control, management, and possession of Home Savings of America, 301 South Maclay Street, San Fernando, California, a savings and loan association the deposits of which were then insured by the Federal Deposit Insurance Corporation.

In committing said offense, defendants BELL and DAY assaulted and put in jeopardy the life of victim assistant manager Elizabeth Aguillon and others by using a handgun, a dangerous weapon and device.

COUNT THREE

[18 U.S.C. § 924(c)]

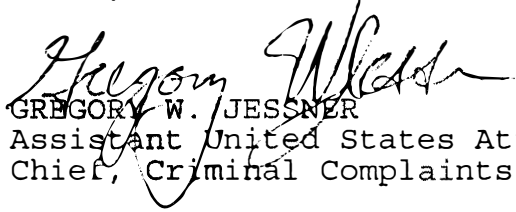
On or about January 26, 1999, in Los Angeles County, within the Central District of California, defendants BRUCE EDWARD BELL and MONTEZ DAY knowingly used and carried a firearm, namely, a loaded .38 caliber revolver, during and in relation to a crime of violence, namely, robbery of Home Savings of America, 301 South Maclay Street, San Fernando, California, in violation of Title 18, United States Code, Section 2113(a), by brandishing the pistol at the employees and customers of Home Savings of America.

A TRUE BILL

Foreperson

ALEJANDRO N. MAYORKAS
United States Attorney

GEORGE S. CARDONA
Assistant United States Attorney
Chief, Criminal Division


GREGORY W. JESSNER
Assistant United States Attorney
Chief, Criminal Complaints

SHARON MCCASLIN
Assistant United States Attorney
Deputy Chief, Criminal Complaints